

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

METSO PAPER USA, INC.,

Plaintiff,

v.

GENERAL ELECTRIC COMPANY,

Defendant.

Civil Action No.: 3:CV-08-47

PLAINTIFF'S SUPPLEMENTAL ANSWER TO DEFENDANT'S INTERROGATORIES

AND NOW COMES the Plaintiff, Metso Paper USA, Inc., by and through its counsel, Howard A. Rothenberg, Esquire, and Robert A. Stern, Esquire (admitted *pro hac vice*), and hereby files the following supplemental answer to GE's Interrogatories, as follows:

David Kuzmick of Metso Paper, Clarks Summit facility, specifically recalls reviewing the sleeve of GE 750 watt bulbs at the Clarks Summit facility before the explosion. Mr. Kuzmick also confirms that prior to the explosion, the Clarks Summit facility operated from Sunday, 11 p.m. to Friday, 11 p.m.; or Monday, 7 a.m. to Saturday, 7 a.m.

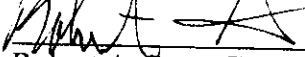
Plaintiff reserves its right to supplement, amend and/or revise this Answer.

Respectfully submitted:

By:


Howard A. Rothenberg, Esquire

By:


Robert A. Stern, Esquire (*pro hac vice*)
Attorneys for Plaintiff

VERIFICATION

I, David Kemick of Metso Paper USA, Inc., depose and say that the facts set forth in the foregoing PLAINTIFF'S SUPPLEMENTAL ANSWER TO DEFENDANT'S INTERROGATORIES are true and correct to the best of my knowledge, information and belief, I understand that false statements herein are made subject to the penalties of 18 PA C.S.A. §4904, relating to unsworn falsifications to authorities.

David Kemick
Supervisor
Title

DATED: 9/29/2010

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

METSO PAPER USA, INC.,

CIVIL ACTION NO.: 3:CV-08-47

Plaintiff,

v.

GENERAL ELECTRIC COMPANY,

Defendant.

CERTIFICATE OF SERVICE

I, Robert A. Stern, Esquire, attorney for Plaintiff, served Plaintiff's Supplemental Response to Defendant's Interrogatories upon Defendant's counsel below named, via regular mail, postage prepaid this 29th day of September, 2010, addressed as follows;

THOMAS COOPER, ESQ.
SMITH, DUGGAN, LLP
LINCOLN NORTH
55 OLD BEDFORD ROAD
LINCOLN, MA 01773-1125

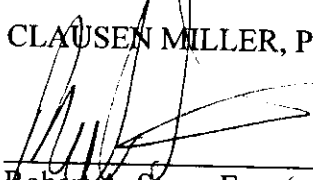
JAMES M. CAMPBELL, ESQ.
CAMPBELL CAMPBELL EDWARDS &
CONROY
ONE CONSTITUTION PLAZA
3RD FLOOR
BOSTON, MA 02129

BENJAMIN A. NICOLosi, ESQ.
MARSHALL, BENNEHEY, WARNER,
COLEMAN & GOGGIN
401 ADAMS AVENUE, SUITE 400
SCRANTON, PA 18510-2025

Respectfully Submitted,

CLAUSEN MILLER, P.C.

By:


Robert A. Stern, Esq. (admitted pro hac vice)
Attorneys for Plaintiff
METSO PAPER USA, INC.
One Chase Manhattan Plaza, 39th Floor
New York, New York 10005
(212) 805-3900

VERIFICATION

I, Dan Kemick of Metso Paper USA, Inc., depose and say that the facts set forth in the foregoing PLAINTIFF'S SUPPLEMENTAL ANSWER TO DEFENDANT'S INTERROGATORIES are true and correct to the best of my knowledge, information and belief, I understand that false statements herein are made subject to the penalties of 18 PA C.S.A. §4904, relating to unsworn falsifications to authorities.

Dan Kemick
Supervisor
Title

DATED: 9/29/2010

**Clausen
Miller** PC

CLAUSEN MILLER P.C.
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Attorneys at Law

One Chase Manhattan Plaza, 39th Floor • New York, NY 10005 • www.clausen.com
March 23, 2011 Tel: 212.805.3900 • Fax: 212.805.3939

VIA OVERNIGHT MAIL

CLERK OF THE COURT

U.S. District Court

William J. Nealon Federal Building

235 N. Washington Avenue

Scranton, PA 18501

Re: Metso Paper USA
Date of Loss: 1/21/06
Docket No.: 3:CV-08-47
Our File No.: 36-2377-00-4

Dear SIR/MADAM:

We represent Plaintiff. As discussed, please find enclosed the Original of the following documents:

1. PLAINTIFF'S MOTION TO PRECLUDE DEFENDANT FROM MENTIONING INSURANCE AND INCORPORATED MEMORANDUM OF LAW;
2. PLAINTIFF'S MOTION TO PRECLUDE DEFENDANT'S USE OF JOSEPH B. SALA AND INCORPORATED MEMORANDUM OF LAW;
3. PLAINTIFF METSO PAPER USA'S MOTION TO PRECLUDE DEFENDANT'S USE OF DONALD J. HOFFMANN AND INCORPORATED MEMORANDUM OF LAW;
4. PLAINTIFF'S MOTION TO PRECLUDE DEFENDANT'S USE OF HARRI KYTOMAA AND INCORPORATED MEMORANDUM OF LAW; and
5. PLAINTIFF'S MOTION TO PRECLUDE DEFENDANT'S USE OF JAMES ARTHUR TOMPKINS, SR. AND INCORPORATED MEMORANDUM OF LAW.

Thank you.

Very truly yours,

CLAUSEN MILLER P.C.

By:

Robert A. Stern

RAS:hg

Enclosure

cc: Howard Rothenberg
Ben Nicolosi

James Campbell
Thomas Cooper

**RECEIVED
SCRANTON**

MAR 24 2011

MARY E. D'ANDREA, CLERK
PER M. E. D'Andrea
DEPUTY CLERK